

COCHISE COUNTY
JUSTICE COURT PRECINCT 2
DOUGLAS, ARIZONA 85607
OCT 01
2019 SEP 31 AM 11:45

1 **MARK BRNOVICH**
2 Attorney General
Firm Bar No. 14000

BY 

3 **NANETTE C. MORROW**
4 Assistant Attorney General
5 State Bar No.: 022608
Pima County Computer No.: 65749
6 400 West Congress, Suite S-315
Tucson, Arizona 85701
7 Telephone No.: (520) 628-6504
8 CRMTCson@azag.gov

9 Attorneys for Plaintiff

10
11 **IN THE JUSTICE COURT OF THE STATE OF ARIZONA**
12 **IN AND FOR THE COUNTY OF COCHISE**

13
14 **STATE OF ARIZONA,**

15 **Plaintiff,**

16 **v.**

17 **RENE ALGARA-GODOY (001),**

18 **Defendant.**

19
20 Case No: *CF2019001118*

21
22 **Felony**

23
24 **COMPLAINT**

25
26
27 The complainant herein personally appears and, being first duly sworn, complains (of his own
knowledge) (on information and belief) against: **RENE ALGARA-GODOY (001) – DOB:**
28 , charging that in Justice Court, Cochise County, Arizona:

29
30 **COUNT ONE**
FRAUDULENT SCHEMES AND PRACTICES, WILFUL CONCEALMENT, A
CLASS FIVE FELONY

31
32 From on or about May 21, 2015, **RENE ALGARA-GODOY (001)**, pursuant to a
33 scheme or artifice to defraud, in a matter related to the business conducted by any department

1 or agency of this State or any political subdivision, knowingly falsified, concealed, or covered
2 up a material fact by any trick, scheme or device made or used any false writing or document
3 knowing such writing or document contained any false, fictitious or fraudulent statement or
4 entry, to wit: a signed Arizona Department of Public Safety, Sworn Applicant – Personal
5 History Questionnaire, containing statements known to be false, was filed in the State of
6 Arizona, in violation of A.R.S. §§ 13-2311, 13-2301, 38-502(6), 13-601, 13-602, 13-603, 13-
7 607, 13-610, 13-701, 13-702, 13-703, 13-711, 13-801, 13-811, 13-2313, and 13-2314.
8

9 **COUNT TWO**

10 **FRAUDULENT SCHEMES AND PRACTICES, WILFUL CONCEALMENT, A**
11 **CLASS FIVE FELONY**

12 From on or about May 22, 2015, RENE ALGARA-GODOY (001), pursuant to a
13 scheme or artifice to defraud, in a matter related to the business conducted by any department
14 or agency of this State or any political subdivision, knowingly falsified, concealed, or covered
15 up a material fact by any trick, scheme or device made or used any false writing or document
16 knowing such writing or document contained any false, fictitious or fraudulent statement or
17 entry, to wit: an Arizona Peace Officer Standards and Training Board, Statement of Personal
18 History and Application for Certification containing statements known to be false, was filed
19 in the State of Arizona, in violation of A.R.S. §§ 13-2311, 13-2301, 38-502(6), 13-601, 13-
20 602, 13-603, 13-607, 13-610, 13-701, 13-702, 13-703, 13-711, 13-801, 13-811, 13-2313, and
21 13-2314.

22 **COUNT THREE**

23 **ALTERING PUBLIC RECORD, A CLASS SIX FELONY**

24 From on or about January 24, 2019, RENE ALGARA-GODOY (001), whom was not
25 a public officer knowingly and without lawful authority falsifies all or any part of any record,
26 or paper, which was filed or deposited in any public office, to wit: an Arizona Department of
27 Public Safety Case Report containing statements known to be false, was filed in the State of
28 Arizona, in violation of A.R.S. §§ 38-421, 38-101, 13-601, 13-602, 13-603, 13-607, 13-610,
13-701, 13-702, 13-703, 13-711, 13-801, 13-811, 13-2313, and 13-2314.

COUNT FOUR
ALTERING PUBLIC RECORD, A CLASS SIX FELONY

From on or about January 24, 2019, RENE ALGARA-GODOY (001), whom was not a public officer knowingly and without lawful authority falsifies all or any part of any record, or paper, which was filed or deposited in any public office, to wit: an Arrest Booking Sheet containing statements known to be false in the Probable Cause Statement, was filed in the State of Arizona, in violation of A.R.S. §§ 38-421, 38-101, 13-601, 13-602, 13-603, 13-607, 13-610, 13-701, 13-702, 13-703, 13-711, 13-801, 13-811, 13-2313, and 13-2314.

COUNT FIVE

ALTERING PUBLIC RECORD, A CLASS SIX FELONY

From on or about January 30, 2019, **RENE ALGARA-GODOY (001)**, whom was not a public officer knowingly and without lawful authority falsifies all or any part of any record, or paper, which was filed or deposited in any public office, to wit: an Arizona Department of Public Safety Arrest Narrative Report containing statements known to be false, was filed in the State of Arizona, in violation of A.R.S. §§ 38-421, 38-101, 13-601, 13-602, 13-603, 13-607, 13-610, 13-701, 13-702, 13-703, 13-711, 13-801, and 13-811.

Complainant:
Federal Bureau of Investigation/
Douglas Police Department

Subscribed and Sworn to me this / day of October, 2019.

Ann Tinner
Judge/Magistrate